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PLAINTIFFS' PROPOSED KEYWORDS

KEYWORDS FOR DEFENDANTS	
Keyword	Relevance of Keyword
TASER, TASN, 87651B104	These keywords are TASER, its stock symbol, and its CUSIP—a unique identifier for TASER. These keywords should capture emails discussing transactions in TASER.
(Reg* sho) or 3370	These keywords refer to rules and regulations governing short sales. Plaintiffs allege Defendants violations of Regulation SHO are a predicate act. These keywords are designed to capture emails discussing violations of these rules.
(borrow or fail) w/20 negative	Plaintiffs allege Defendants intentionally failed to deliver and did not actually borrow securities when they were expensive to borrow, meaning they had a high negative rate.
(without or fail*) w/5 (locat* or delive* or receiv*)	Plaintiffs allege Defendants failed to obtain locates and intentionally failed to deliver securities and did not clean up failures to receive. These keywords are designed to capture email communications about such plans.
Violat*	Plaintiffs allege Defendants conspired to violate the law. This keyword is designed to capture emails discussing whether conduct violates the law
Short w/20 (naked or abusive)	The scheme Plaintiffs' allege is frequently referred to as naked short selling or abusive short selling. This keyword is designed to capture documents discussing the practice.
Conversion*	Plaintiffs allege that Defendants have engaged in illegal conversions and reverse conversions of TASER stock. This conduct is currently the subject of an ongoing SEC investigation.
Flex*	Plaintiffs allege that Defendants have engaged in flex transactions. This conduct is currently the subject of an ongoing SEC investigation
Arenstein; Aronstein; "ala trading;" Hazan; HCM; Wolfson (Merrill only)	These keywords refer to Merrill Lynch clients and their principles who were sanctioned for naked short selling. The SEC is currently investigating Merrill Lynch for its dealings with Hazan and Arenstein

“certain threshold” or 07729 (Merrill only)	These keywords are the names for the ongoing SEC investigation into Merrill Lynch. These keywords are designed to capture documents discussing the investigation
Testi* (Merrill only)	Plaintiffs have requested Merrill Lynch search this keyword for any trader or sales person who provided testimony in the SEC’s investigation for 30 days before and after the testimony.